

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF NEW HAMPSHIRE

_____	:	
Laurie Ortolano	:	
	:	
v.	:	Civil Action No. 22-cv-00326-LM
	:	
The City of Nashua, et al.	:	
_____	:	

**JOINT MOTION TO EXTEND PRETRIAL FILING DEADLINES**

NOW COME all Parties in the above-captioned matter and respectfully request that the Court extend the deadline for filing pretrial statements, motions, and related filings from March 13, 2025, to the later of March 20, 2025, or seven days after rulings pending dispositive motions and motions related thereto. In support hereof the Parties state as follows:

1. This case involves claims well known to Court.
2. The Court has scheduled trial in this matter to take place in the period beginning April 15, 2025. Under the current trial order, pretrial filings are due on March 13, 2025.
3. There are, however, multiple Motions for Summary Judgment that remain pending, decisions on which may drastically reshape or reduce the claims and parties before the Court. *See* Doc. Nos. 86, 87, 88 and 91. In addition, Defendants Bolton and Leonard have filed a Motion to Reconsider the denial of their Motion for Summary Judgment that is also pending. *See* Doc. No. 117.
4. Given the possibility that one or more of the remaining Defendants or specific counts could be dismissed, both judicial economy and the parties' own resources would be best served by extending the pretrial filing deadlines until such motions are resolved.

5. The Parties hope that the pending motions might be decided by March 13, 2025, which would allow time for the remaining parties, if any, to file more focused pretrial papers by March 20, 2025. Short thereof, the Parties seek seven days from the rulings on the pending dispositive motions and motions related thereto to file pretrial papers.

6. In the alternative, if the Court does not anticipate ruling on the pending motions prior to March 13, the Parties suggest that the status conference be scheduled for March 20, 2025, or such earlier time as suits the Court, at which time the trial status could be addressed.

WHEREFORE, the Parties respectfully request this Honorable Court:

- A. Extend the pretrial motion filing deadline by one week to the later of March 20, 2025, or seven days after the ruling on pending motions; or
- B. Set a status conference for March 20, 2025, to address the pretrial conference and trial dates if needed; and
- C. Grant such further relief as the Court deems fair and just.

Date: March 7, 2025

**Laurie Ortolano**

By counsel,

/s/ William Aivalikles

William Aivalikles

253 Main Street

Nashua, NH 03060

(603) 880-0303

[william@nhtriallaw.com](mailto:william@nhtriallaw.com)

Respectfully submitted,

**City of Nashua and Michael Carignan**

By counsel,

**CULLEN COLLIMORE SHIRLEY, PLLC**

/s/ Brian J. S. Cullen

Brian J.S. Cullen

37 Technology Way, Suite 3W2

Nashua, NH 03060

(603) 881-5500

[bcullen@cullencollimore.com](mailto:bcullen@cullencollimore.com)

**Kimberly Kleiner**

By counsel,

**FRIEDMAN FEENEY, PLLC**

/s/ Dona Feeney

Dona Feeney  
95 North Street, Suite #5  
Concord, NH 03301  
(603) 783-5105  
[dfeeney@friedmanfeeney.com](mailto:dfeeney@friedmanfeeney.com)

**Inception Technologies and Raymond Feoli**

By counsel,

**CORRIGAN LAW OFFICES, PC**

/s/ Brian Corrigan

Brian Corrigan  
122 Chestnut Street  
P.O. Box 1782  
Andover, MA 01810  
(978) 988-1544  
[Corriganlaw@gmail.com](mailto:Corriganlaw@gmail.com)

**Steve Bolton and Celia Leonard**

By counsel,

**UPTON & HATFIELD, LLP**

/s/ Russell F. Hilliard

Russell F. Hilliard  
Brooke Lovett Shilo  
159 Middle Street  
Portsmouth, NH 03801  
(603) 436-7046  
[rhilliard@upton-hatfield.com](mailto:rhilliard@upton-hatfield.com)  
[bshilo@upton-hatfield.com](mailto:bshilo@upton-hatfield.com)

**CERTIFICATE OF SERVICE**

I certify that a copy of this filing was served via the Court's ECF filing system upon counsel of record.

Dated: March 7, 2025

By: /s/ Brian J.S. Cullen

Brian J.S. Cullen